

REMARKS/ARGUMENTS

Favorable reconsideration of the present application is respectfully requested.

Claim 1 has been amended to clarify the claimed dimensional difference is a margin provided between the pins and respective insertion parts in each of the links, wherein the pins have a larger dimension than the respective insertion parts, e.g., for press fitting. Basis for this is evident from the specification, particularly beginning at line 21 of page 4. Claim 1 has also been amended to specify that the fixing is provided at edges of a respective insertion part orthogonal to the longitudinal direction of the insertion part. Basis for this is found at lines 7-9 of page 8 and in the paragraph bridging pp. 16-17, i.e., the lower and upper edges of the pin and interpiece are fitted to the pin fixing part.

Claims 1-4 and 11 have again been rejected under 35 U.S.C. §103 as being obvious over Van Rooij et al in view of Sakamoto et al, wherein Sakamoto et al was cited to teach the claimed difference in dimension at lines 64-65 of col. 3 and lines 17-20 of col. 6. However, Applicants respectfully note that the differences “c” and “e” described in these portions of Sakamoto et al could not teach the claimed dimensional difference between the pins and respective insertion parts for a given link of Van Rooij et al, because the difference “c” refers to a *clearance* of unspecified value (col. 5, lines 57-58) and the difference “e” refers to a dimensional difference between the link plate 2 and the guide plate 4, i.e., two different plates.

More particularly, a given pin 3 in Sakamoto et al passes through holes in both link plates 2 having dimension h_l (Fig. 1a) and guide plates 4 having dimension h_g (Fig. 1b). The pins rotate loosely in the link plate 2 due to a clearance “c” of unspecified value and are press fit in the guide plates 4. Moreover, the clearance “e” shown in Fig. 2 is provided between the link plates 2 and guide plates 4, and has a value $e = h_l - h_g - c/2$ (col. 5, line 57). It is this clearance “e” that is identified as having a value equal to or greater than 0.2 mm.

Thus, Sakamoto et al discloses a clearance; a press-in margin of value “c” would likely cause the link to break. Further, Sakamoto et al identifies no value of a dimensional difference between the pins and respective insertion parts *of a given link*. The dimensional difference of 0.2 mm (col. 6, lines 20-21) refers to the dimensional difference $h_l - h_g$ between plates 2 and 4, and has nothing to do with a dimensional difference between the pins and respective insertion parts of a given link. Accordingly, Sakamoto et al could not teach one skilled in the art to provide any particular such dimensional difference in Van Rooij et al.

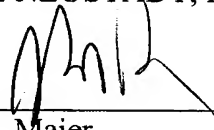
Finally, Applicants recognize that press fitting, *per se*, is a known technique in the art for fitting circular elements in circular holes. In this case the elements are press fit about their entire peripheries. On the other hand the non-circular pins according to the invention are fixed to the front and back insertion parts by fitting at edges orthogonal to the longitudinal direction of the insertion part. This is also not taught in the prior art.

Dependent Claims 5-7 were rejected under 35 U.S.C. §103 as being obvious over Van Rooij et al in view of Mercier and Sakamoto et al. Similarly, dependent Claims 8-10 were rejected under 35 U.S.C. §103 as being obvious over Van Rooij et al in view of Forster and Sakamoto et al. In each case, however, the additional references were cited to teach features of the dependent claims, and there is no evidence that they overcome the shortcomings of van Rooij et al and Sakamoto et al with respect to Claim 1 from which these claims depend, and so the claims are also believed to define over this prior art.

Applicants therefore believe that the present application is in a condition for allowance and respectfully solicit an early notice of allowability.

Respectfully submitted,

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